

UNITED STATES DISTRICT COURT

for the

Eastern District of Washington

United States of America

v.

ROBERT LEROY TILLMAN

Case No. 4:19-CR-6007-SMJ-2

Defendant

ARREST WARRANT

To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay

(name of person to be arrested) ROBERT LEROY TILLMAN,
who is accused of an offense or violation based on the following document filed with the court:

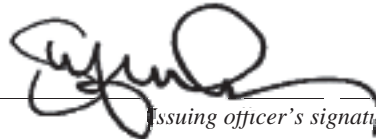
- ☒ Indictment ☐ Superseding Indictment ☐ Information ☐ Superseding Information ☐ Complaint
☐ Probation Violation Petition ☐ Supervised Release Violation Petition ☐ Violation Notice ☐ Order of the Court

This offense is briefly described as follows:

18 U.S.C. § 1594(c) Conspiracy to Commit Sex Trafficking by Force, Fraud, or Coercion
18 U.S.C. § 1591(a)(1), (b)(1) Sex Trafficking by Force, Fraud, or Coercion

Date: Jan 15, 2019, 1:38 pm

City and state: Yakima, Washington


Issuing officer's signature



Sean F. McAvoy, Clerk of Court/DCE
Printed name and title

Return

This warrant was received on (date) _____, and the person was arrested on (date) _____
at (city and state) _____.

Date: _____

Arresting officer's signature

Printed name and title

Joseph H. Harrington
United States Attorney
Eastern District of Washington
Meghan M. McCalla
Assistant United States Attorney
402 E. Yakima Ave., Suite 210
Yakima, WA 98901
Telephone: (509) 454-4425

FILED IN THE U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

JAN 15 2019

SEAN F. MCAVOY, CLERK
DEPUTY
YAKIMA, WASHINGTON

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

Plaintiff,

vs.

ROBERT SAMUEL TILLMAN;
ROBERT LEROY TILLMAN; and
BRANDON C. CAMPBELL;

Defendants.

4:19-CR-6007-SMJ
INDICTMENT

Vio: 18 U.S.C. § 1594(c)
Conspiracy to Commit Sex Trafficking by
Force, Fraud, or Coercion (Count 1)

18 U.S.C. § 1591(a)(1), (b)(1)
Sex Trafficking by Force, Fraud, or
Coercion (Counts 2, 4, and 6)

18 U.S.C. § 1591(a)(2), (b)(1)
Benefitting from Sex Trafficking by Force,
Fraud, or Coercion (Counts 3, 5, and 7)

18 U.S.C. § 1591(a)(1), (b)(2)
Child Sex Trafficking (Count 8)

18 U.S.C. § 1591(a)(2), (b)(2)
Benefitting from Child Sex Trafficking
(Count 9)

18 U.S.C. § 1594
Notice of Forfeiture Allegations

1 The Grand Jury charges:

2 COUNT 1

3
4 Beginning on or about April 2, 2018, and continuing until on or about May
5 29, 2018, in the Eastern District of Washington and elsewhere, the Defendants,
6 ROBERT SAMUEL TILLMAN, ROBERT LEROY TILLMAN, and BRANDON
7 C. CAMPBELL, confederated and agreed together and with each other, and with
8 other persons known and unknown to the Grand Jury, to knowingly, in and
9 affecting interstate and foreign commerce, recruit, entice, harbor, transport,
10 provide, obtain, advertise, and maintain by any means, persons, knowing and in
11 reckless disregard of the fact that force, threats of force, fraud, and coercion, as
12 defined in Title 18, United States Code, Section 1591(e)(2), and any combination
13 of such means, would be used to cause such persons to engage in commercial sex
14 acts, in violation of 18 U.S.C. § 1591(a); all in violation of 18 U.S.C. § 1594(c).
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19 COUNT 2

20 Beginning on or about April 2, 2018, and continuing until on or about April
21 16, 2018, in the Eastern District of Washington and elsewhere, the Defendants,
22 ROBERT SAMUEL TILLMAN and ROBERT LEROY TILLMAN, knowingly, in
23 or affecting interstate commerce, recruited, harbored, transported, provided,
24 obtained, advertised, and maintained Victim V, knowing and in reckless disregard
25 of the fact that means of force, threats of force, fraud, and coercion would be used
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1 to cause Victim V to engage in a commercial sex act, in violation of 18 U.S.C. §
2 1591(a)(1), (b)(1).

3
4 COUNT 3

5 Beginning on or about April 2, 2018, and continuing until on or about April
6 16, 2018, in the Eastern District of Washington and elsewhere, the Defendant,
7 ROBERT SAMUEL TILLMAN, knowingly benefited, financially and by
8 receiving anything of value, from participation in a venture which had, in or
9 affecting interstate commerce, recruited, harbored, transported, provided, obtained,
10 advertised, and maintained Victim V, knowing and in reckless disregard of the fact
11 that means of force, threats of force, fraud, and coercion would be used to cause
12 Victim V to engage in a commercial sex act, in violation of 18 U.S.C. §
13 1591(a)(2), (b)(1).
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17 COUNT 4

18
19 Beginning in or about April 2018, and continuing until in or about May
20 2018, in the Eastern District of Washington and elsewhere, the Defendants,
21 ROBERT SAMUEL TILLMAN and BRANDON C. CAMPBELL, knowingly, in
22 or affecting interstate commerce, recruited, harbored, transported, provided,
23 obtained, advertised, and maintained Victim W, knowing and in reckless disregard
24 of the fact that means of force, threats of force, fraud, and coercion would be used
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1 to cause Victim W to engage in a commercial sex act, in violation of 18 U.S.C. §
2 1591(a)(1), (b)(1).

3
4 COUNT 5

5 Beginning in or about April 2018, and continuing until or about May 2018,
6 in the Eastern District of Washington and elsewhere, the Defendant, ROBERT
7 SAMUEL TILLMAN and BRANDON C. CAMPBELL, knowingly benefited,
8 financially and by receiving anything of value, from participation in a venture
9 which had, in or affecting interstate commerce, recruited, harbored, transported,
10 provided, obtained, advertised, and maintained Victim W, knowing and in reckless
11 disregard of the fact that means of force, threats of force, fraud, and coercion
12 would be used to cause Victim W to engage in a commercial sex act, in violation
13 of 18 U.S.C. § 1591(a)(2), (b)(1).
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18 COUNT 6

19 Beginning in or about April 2018, and continuing until on or about May 29,
20 2018, in the Eastern District of Washington and elsewhere, the Defendants,
21 ROBERT SAMUEL TILLMAN and BRANDON C. CAMPBELL, knowingly, in
22 or affecting interstate commerce, recruited, harbored, transported, provided,
23 obtained, advertised, and maintained Victim E, knowing and in reckless disregard
24 of the fact that means of force, threats of force, fraud, and coercion would be used
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1 to cause Victim E to engage in a commercial sex act, in violation of 18 U.S.C. §
2 1591(a)(1), (b)(1).

3
4 COUNT 7

5 Beginning in or about April 2018, and continuing until on or about May 29,
6 2018, in the Eastern District of Washington and elsewhere, the Defendant,
7 ROBERT SAMUEL TILLMAN and BRANDON C. CAMPBELL, knowingly
8 benefited, financially and by receiving anything of value, from participation in a
9 venture which had, in or affecting interstate commerce, recruited, harbored,
10 transported, provided, obtained, advertised, and maintained Victim E, knowing and
11 in reckless disregard of the fact that means of force, threats of force, fraud, and
12 coercion would be used to cause Victim E to engage in a commercial sex act, in
13 violation of 18 U.S.C. § 1591(a)(2), (b)(1).

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17 COUNT 8

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19 Beginning in or about April 2018, and continuing until on or about May 29,
20 2018, in the Eastern District of Washington and elsewhere, the Defendants,
21 ROBERT SAMUEL TILLMAN and BRANDON C. CAMPBELL, knowingly, in
22 or affecting interstate commerce, recruited, harbored, transported, provided,
23 obtained, advertised, and maintained Victim E, knowing and in reckless disregard
24 of the fact that Victim E had not attained the age of 18 years and would be caused
25 to engage in a commercial sex act, in violation of 18 U.S.C. § 1591(a)(1), (b)(2).

COUNT 9

Beginning in or about April 2018, and continuing until on or about May 29, 2018, in the Eastern District of Washington and elsewhere, the Defendant, ROBERT SAMUEL TILLMAN and BRANDON C. CAMPBELL, knowingly benefited, financially and by receiving anything of value, from participation in a venture which had, in or affecting interstate commerce, recruited, harbored, transported, provided, obtained, advertised, and maintained Victim E, knowing and in reckless disregard of the fact that Victim E had not attained the age of 18 years and would be caused to engage in a commercial sex act, in violation of 18 U.S.C. § 1591(a)(2), (b)(2).

NOTICE OF CRIMINAL FORFEITURE

The allegations contained in this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture.

Pursuant to 18 U.S.C. § 1594, upon conviction of an offense(s) in violation of 18 U.S.C. § 1591, as charged in Counts 1 – 9 of this Indictment, Defendants, ROBERT SAMUEL TILLMAN, ROBERT LEROY TILLMAN and BRANDON C. CAMPBELL, shall forfeit to the United States of America (1) any property, real or personal, involved in, used, or intended to be used to commit or to facilitate the commission of the offense[s], and any property traceable to such property; and (2)

1 any property, real or personal, constituting or derived from, any proceeds obtained,
2 directly or indirectly, as a result of the offense[s], and any property traceable to
3 such property. The property to be forfeited includes, but is not limited to, the
4 following:
5

6 A sum of money in U.S. currency representing the amount of
7 proceeds obtained as a result of the sex trafficking offense(s).
8

9
10 If any of the property described above, as a result of any act or omission of
11 the defendant[s]:
12

- 13 a. cannot be located upon the exercise of due diligence;
- 14 b. has been transferred or sold to, or deposited with, a third party;
- 15 c. has been placed beyond the jurisdiction of the court;
- 16 d. has been substantially diminished in value; or
- 17 e. has been commingled with other property which cannot be
18 divided without difficulty,
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1
2 the United States of America shall be entitled to forfeiture of substitute property
3 pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c).
4

5 DATED this 15th day of January, 2019.
6

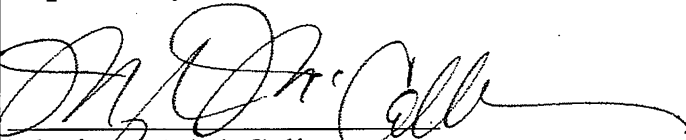
7 A TRUE BILL
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10 For person
11

12 Joseph H. Harrington
13 United States Attorney
14

15 
16

17 Thomas J. Hanlon
18 Supervisory Assistant United States Attorney
19

20 
21

22 Meghan M. McCalla
23 Assistant United States Attorney
24
25
26
27
28

JAN 15 2019

SEAN F. McAVOY, CLERK
DEPUTY
SPOKANE, WASHINGTON

PENALTY SLIP

NAME: ROBERT LEROY TILLMAN

NUMBER OF COUNTS: 2

Count 1:

Viol: 18 U.S.C. § 1594(c) – Conspiracy to Commit Sex Trafficking by Force, Fraud, or Coercion

Penalty: Up to life imprisonment, \$250,000 fine, or both; with NLT 5 years but up to life of supervised release, and a \$100.00 special assessment.

Count 2:

Viol: 18 U.S.C. § 1591(a)(1), (b)(1) – Sex Trafficking by Force, Fraud, or Coercion

Penalty: CAG NLT 15 years and up to life imprisonment, \$250,000 fine, or both; with NLT 5 years but up to life of supervised release, and a \$100.00 special assessment.

All Counts: an ADDITIONAL \$5,000 special penalty assessment. Upon conviction, unless the Sentencing Court finds the defendant to be indigent, or that assessment is not payable due to other fines, orders of restitution, and any other victim-compensation obligation arising out of the criminal conviction that has been paid, an additional mandatory special assessment of \$5,000 must also be imposed. See 18 U.S.C. 3014(a).

Case No. 4:19-CR-6007-SMJ-2

USA Initials: MMM